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(1) Hadnagy Intimidation

- **Reynolds (Mertens Decl. Exhibit 5):** 73:22–77:13 (describing Hadnagy’s multi-pronged pattern of retaliation against her as part of his “pattern of intimidation” against employees who left Social-Engineer); 106:14–25 (describing a former Social-Engineer employee named Laurie Varner telling Def Con on the September 7, 2021, call about witnessing Hadnagy’s volatile and “intimidating” moments at work); 147:23–148:3 (describing how Hadnagy joked about hiring a hit man to kill her); 150:22–152:19 (describing why she approached Def Con about Hadnagy, since Hadnagy engaged in “pattern of intimidation” arising from the prestige he derived from Def Con and Black Hat).
- **Fincher (Mertens Decl. Exhibit 20):** 23:9–25:20 (describing Hadnagy engaging in “general bullying behavior and intimidation” at work, including publicly berating employees, scaring them to the point where they would not take bathroom breaks, and the “astronomical” headcount and turnover as a result); 50:14–52:25 (testifying that Hadnagy yelled at staff and volunteers at Def Con and how she believed it was “inappropriate,” unprofessional, and was a “fairly regular occurrence”); 43:1–47:23 (describing Hadnagy’s training materials that required women to ask men about circumcision as “inappropriate,” made her “uncomfortable,” and made her worry about safety).
- **Levine (Mertens Decl. Exhibit 23):** 14:21–17:12 (describing how Hadnagy would pull out a knife and threaten to “cut” attendees at Def Con while intoxicated); 21:12–22:10 (describing how she witnessed Hadnagy yelling at individuals at Def Con and how it made her scared, even though it was not directed at her); 45:3–46:1 (describing how Hadnagy’s behavior, such as yelling, throwing things, and pulling out his knife, scared her and intimidated her); 126:2–13 (describing how Hadnagy playing with his knife while intoxicated at Def Con made her feel “uncomfortable”).

- **Gamble (Mertens Decl. Exhibit 40):** 58:23–61:23 (explaining how Hadnagy contacted conference organizers to get her blacklisted from conferences and cancel her talk at a conference, and how it made her “highly uncomfortable”); 40:9–41:20 (describing how Hadnagy would pull out a knife at Def Con and threaten to “shank” people and she grew to be “uncomfortable with it”); 42:15–44:7 (finding Hadnagy’s training materials that required women and men to ask sensitive, sexual questions to be “inappropriate” and “invasive,” and made her feel “highly uncomfortable” and “unsafe”).
- **Murdock (Mertens Decl. Exhibit 22):** 32:18–34:2, 88:24–89:18 (describing how “it was impossible not to be” intimidated and afraid when Hadnagy pulled out his knife and made comments about “shanking or throat-punching” people at Def Con); 50:5–51:7 (describing how Hadnagy got so angry with her that he needed “physical space,” how it made her “scared,” and how she cried in the bathroom after); 27:9–28:12 (describing how it made her feel “uncomfortable” that Hadnagy would joke about “throat-punching”); 59:4–60:17 (recounting how she “definitely felt intimidated” and when Hadnagy threw a cell phone at her); 44:2–51:7 (describing how Hadnagy was not respectful of others at conferences, where he did not use a person’s preferred pronouns and intentionally mispronounced a Muslim man’s name and then got angry with her when she corrected his pronunciation); 82:20–84:10 (describing how Hadnagy yelled at her at Def Con and how it made her feel “uncomfortable,” “unwelcome,” and “afraid”); 84:14–87:4 (describing how Hadnagy yelled at other employees, the Def Con volunteers and staff, and attendees at Def Con and how it made her feel “uncomfortable”); 113:6–116:4 (describing Hadnagy sending cease-and-desist letters to her new employer over a year after she left his employment and how it was “intimidating”); 121:3–123:18 (describing how Hadnagy wrote an article about her where he said that he wanted to “ruin her career” and how she was “intimidated” and “afraid” for her job and reputation); 124:7–128:21 (describing how she felt afraid for her career after Hadnagy sent an email to a journalist accusing her of theft and calling her a “terrible person”).

(2) Hadnagy Harassment

- **Reynolds (Mertens Decl. Exhibit 5):** 139:8–140:21 (describing how Hadnagy referred to her as “hot” on several occasions and how she found it “demeaning”).

- **Fincher (Mertens Decl. Exhibit 20):** 21:11–16 (describing Hadnagy calling her “hot Asian” and how she found it “uncomfortable and extremely annoying”); 29:14–32:8 (describing how Hadnagy selected a candidate at the Def Con conference based on her physical appearance, saying “she’s hot and she’s Asian. She’s in.”); 32:9–23 (testifying that she believes it was inappropriate for Hadnagy to comment on a young female contestant’s appearance at Def Con and how it made her “uncomfortable”); 32:24–33:2 (stating that Hadnagy made comments about Asian women “fairly regularly”).
- **Murdock (Mertens Decl. Exhibit 22):** 35:6–37:16 (describing how Hadnagy made it “known” that he had a sexual preference for Asian women and how his comments about Asian women were “inappropriate” and made her feel “uncomfortable”); 37:17–40:23 (describing Hadnagy’s comments on women’s appearances).
- **Gamble (Mertens Decl. Exhibit 40):** 19:15–21:15 (describing how Hadnagy’s comments on women’s appearances made her feel “uncomfortable” and that she found the comments to be “inappropriate”); 21:2–23:11 (describing Hadnagy’s comment on her weight and how she “finally looked [her] age,” saying it made her “uncomfortable”); 26:2–27:11 (describing how Hadnagy kissed her forehead on a business trip outside her hotel room and how she found it “inappropriate” and made her “uncomfortable”); 31:4–33:5 (describing how Hadnagy asked her personal questions about her body, such as pubic hair and breast measurements, that Hadnagy lied that these questions were from law enforcement for a sting operation, and that the questions made her “uncomfortable”); 26:7–11 (describing how Hadnagy told her that he was a “boob guy” and how it was “inappropriate” and made her feel “uncomfortable”).